



1 IT IS HEREBY STIPULATED by and between Plaintiff, REGINA CASTRO  
2 and Defendants, COUNTY OF LOS ANGELES, and CHAD MELTON, by and  
3 through their counsel of record, to continue the OSC re Dismissal currently  
4 scheduled for January 17, 2025 (Dkt. 48), subject to approval by the Court. The  
5 parties submit that, as outlined below, GOOD CAUSE exists for this continuance.

6 1. The Parties participated in a mediation on December 15, 2023, with  
7 mediator Judge Joseph Biderman (Ret.).

8 2. On December 27, 2023, the Parties filed their Joint Status Report  
9 Regarding Conditional Settlement of Entire Action and Request to Continue and/or  
10 Vacate all Dates. (Dkt. 44).

11 3. On December 27, 2023, the Court set an Order to Show Cause re  
12 Dismissal for March 22, 2024 and vacated all dates and deadlines. (Dkt. 45).

13 4. On February 27, 2024, Plaintiff and her counsel signed the Release in  
14 Full Settlement and Compromise Agreement.

15 5. On March 6, 2024, the Parties filed their Response to OSC and  
16 Stipulation to Continue OSC re Dismissal, whereby the County estimated that the  
17 approval process will take approximately nine (9) months. (Dkt. 46).

18 6. On March 18, 2024, the Court continued the OSC re Dismissal to  
19 January 17, 2025. (Dkt. 48).

20 7. The settlement is subject to the County's approval process, which  
21 entails final approval by the Contract Cities Claims Board and the County of Los  
22 Angeles Board of Supervisors. The approval process is underway, but it is expected  
23 to take another several months to complete.

24 8. Once the LASD completes its internal review of a matter, it forwards  
25 its required documentation to the LASD Risk Management Bureau and the CEO of  
26 Risk Management for Los Angeles County for review. Upon the concurrence of the  
27 CEO of Risk Management for Los Angeles County, the documentation is processed  
28 through the LASD chain of command. Once the final signature process for LASD is

1 complete, the documentation is provided to the CEO of Risk Management for Los  
2 Angeles County for final review and signature, at which time the matter can be  
3 placed on the Contract Cities Claims Board agenda. After approval by the Contract  
4 Cities Claims Board, the matter will then be placed on the Public Safety Cluster  
5 Review agenda, which is typically within 30 days. After the Cluster Agenda has  
6 been advised of the settlement, the matter will go before the County Board of  
7 Supervisors for approval, which is typically within 30 days.

8       9. Based on defense counsel's understanding and belief, the Los Angeles  
9 County Sheriff's Department Risk Management Bureau has been restructured,  
10 which created a further backlog of matters awaiting settlement approval. Along  
11 with the restructuring was the implementation of a new format and structure for  
12 documentation required for a matter to proceed to the Contract Cities Claims Board  
13 for settlement approval.

14       10. The Contract Cities Claims Board meets once a month, typically on the  
15 second Wednesday of the month. It is expected that this matter will be on the  
16 Contract Cities Claims Board Agenda in or around April 2025. If the Settlement is  
17 approved by the Contract Cities Claims Board, it is expected that it will be on the  
18 Board of Supervisors Agenda within 45 days and, if approved by the Board of  
19 Supervisors, that Plaintiff will receive the settlement funds within 45 days of the  
20 final approval.

21       11. If the Settlement is approved, the Parties will file a stipulation to  
22 dismiss the entire action with prejudice within ten days of Plaintiff's receipt of the  
23 settlement funds.

24       12. Therefore, the Parties respectfully request the Court continue the OSC  
25 re Dismissal from January 17, 2025, to April 25, 2025, and further respectfully  
26 request the Court to maintain jurisdiction over the case pending the approval of the  
27 settlement.

28           IT IS SO STIPULATED.

1

2 DATED: January 6, 2025

**LAW OFFICES OF DALE K. GALIPO**

3

4

By: /s/ Shannon Leap

5

Dale K. Galipo, Esq.

6

Marcel F. Sincich, Esq.

7

Shannon J. Leap, Esq.

8

*Attorneys for Plaintiff REGINA CASTRO*

9

10

DATED: January 6, 2025

**CARPENTER, ROTHANS & DUMONT**

11

12

/s/ Jill Williams

13

By: \_\_\_\_\_

14

Jill Williams

15

Scott J. Carpenter

16

*Attorneys for Defendant COUNTY OF LOS  
ANGELES*

17

18

DATED: January 6, 2025

**SEKI, NISHIMURA & WATASE, PLC**

19

20

21

22

23

24

25

26

27

28

By: /s/ Janet Keuper

29

Janet L. Keuper

30

*Attorneys for Defendant CHAD MELTON*

31

32

33

34

35

36

37

38

39

40

41

42

43

44